

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEBRASKA**

---

LISSETTE LARIOS ROOHBAKHSH, as  
personal representative of the ESTATE  
OF FATIMA LISSETTE LARIOS and on  
behalf of next of kin,

Case No. 8:17-cv-00031

and

NELSON LARIOS, as next of kin,

**DECLARATION OF SHERRI SIMONS**

Plaintiffs,

v.

BOARD OF TRUSTEES OF THE  
NEBRASKA STATE COLLEGES,

and

CHADRON STATE COLLEGE,

Defendants.

---

I, Sherri Simons, hereby depose and state as follows:

1. I am over 21 years old and have personal knowledge of the matters set forth in this declaration.

2. I am a former employee of Chadron State College ("CSC"). During my time at CSC, I held the position of Director of Housing & Residential Life during the 2014-2015 academic year.

3. Exhibit 37 is a true and correct copy of my January 21 2015 email between Cassie Mitchell, Pat Beu, and me regarding Fatima Larios and Brandon Finona-Gardner's verbal arguments in the dormitory.

4. Exhibit 40 is a true and correct copy of the January 17-23, 2015 Student Observation Report for CSC High Rise Residence Hall 3<sup>rd</sup> Floor.

5. Exhibit 41 is a true and correct copy of the January 24-30, 2015 Student Observation Report for CSC High Rise Residence Hall 11<sup>th</sup> Floor.

6. Exhibit 42 is a true and correct copy of the January 24-30, 2015 Student Observation Report for CSC High Rise Residence Hall 3<sup>rd</sup> Floor.

7. Exhibit 43 is a true and correct copy of the January 12-16, 2015 Student Observation Report for CSC High Rise Residence Hall 11<sup>th</sup> Floor.

8. Exhibit 44 is a true and correct copy of the January 12-16, 2015 Student Observation Report for CSC High Rise Residence Hall 3<sup>rd</sup> Floor.

9. Exhibit 45 is a true and correct copy of the January 19, 2015 email I received from Cassie Mitchell.

10. Exhibit 46 is a true and correct copy of the September 26, 2014 CSC Residence Hall Contract signed by Fatima Larios.


11. Exhibit 49 is a true and correct copy of the June 9, 2014 CSC Residence Hall Contract signed by Fatima Larios.

12. Exhibit 50 is a true and correct copy of the 2014-2015 CSC Student Handbook.

13. Exhibit 51 is a true and correct copy of the September 12, 2014 Student Observation Report for CSC Andrews Residence Hall 3<sup>rd</sup> Floor West.

14. Exhibit 53 is a true and correct copy of the CSC Department of Residence Life February 5, 2015 Incident Report.

I declare under penalty of perjury that the foregoing is true and correct. Executed on  
this 7 day of Feb., 2019.

  
Sherri Simons